

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WILLIAM DURHAM, JR.,)
)
Plaintiff,)
)
v.) Civil Action No. 04-297 Erie
)
CITY AND COUNTY OF ERIE, et al.,)
)
Defendants.) **Electronically Filed**
)

DEFENDANT'S MOTION FOR EXTENSION OF TIME

AND NOW, comes the defendant, Bruce Tackett, by his attorneys, Thomas W. Corbett, Jr., Attorney General, Kemal Alexander Mericli, Senior Deputy Attorney General, Susan J. Forney, Chief Deputy Attorney General, Chief Litigation Section, who respectfully submits the following:

1. Just like the defendants in this action who are represented by Mr. Joyal, Mr. Tackett is also dependent upon a transcript of the plaintiff's deposition for a full presentation of the motion for summary judgment he plans to file on his own behalf. Those defendants represented by Mr. Joyal have successfully sought an extension of time to file a motion for summary judgment for this reason.

2. Consequently, Mr. Tackett requests a similar extension of time until July 13, 2006 in which to file his motion for summary judgment in this case.

WHEREFORE, it is respectfully requested that Bruce Tackett be granted an extension.

Respectfully submitted,

THOMAS W. CORBETT, JR.
Attorney General

By: s/Kemal Alexander Mericli
Kemal Alexander Mericli
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Date: June 23, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Defendant's Motion for Extension of Time was served upon the following via electronic/first-class mail on June 23, 2006.

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